

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

TELEPUTERS, LLC, §
§
Plaintiff, § CASE NO. 6:20-cv-00600 (ADA)
v. §
§
ORACLE CORPORATION AND SUN §
MICROSYSTEMS, INC., §
§
Defendants. §
§

JOINT MOTION FOR ENTRY OF PROPOSED PROTECTIVE ORDER

Pursuant to The Court’s Order of February 8, 2021 in this action, Plaintiff Teleputers, LLC (“Teleputers”) and Defendants Oracle Corporation and Sun Microsystems, Inc. (collectively, “Oracle”) provide this joint proposed protective order, attached as Ex. A.

Dated: March 1, 2021

Respectfully submitted,

/s/ Melissa R. Smith

Jared Bobrow
CA Bar No. 133712
ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Road
Menlo Park, California 94025-1015
Telephone: (650) 614-7405
Facsimile: (650) 614-7401
Email: jbobrow@orrick.com

Don Daybell
CA Bar No. 210961
ORRICK, HERRINGTON & SUTCLIFFE LLP
2050 Main Street, Suite 1100
Irvine, California 92614
Telephone: (949) 567-6700
Facsimile: (949) 567-6710
Email: ddaybell@orrick.com

Melissa R. Smith
State Bar No. 24001351
GILLAM & SMITH, LLP
303 South Washington Avenue
Marshall, Texas 75670
Telephone: (903) 934-8450
Facsimile: (903) 934-9257
Email: melissa@gillamsmithlaw.com

Attorneys for Defendants

Dated: March 1, 2021

Respectfully submitted,

/s/ Randall Garteiser

Randall T. Garteiser

Texas Bar No. 24038912

RGARTEISER@GHIPLAW.COM

Christopher A. Honea

Texas Bar No. 24059967

CHONEA@GHIPLAW.COM

M. Scott Fuller

Texas Bar No. 24036607

SFULLER@GHIPLAW.COM

Thomas G. Fasone III

Texas Bar No. 00785382

TFASONE@GHIPLAW.COM

GARTEISER HONEA PLLC

119 W. FERGUSON STREET

TYLER, TEXAS 75702

TELEPHONE: (888) 908-4400

Raymond W. Mort, III

Texas Bar No. 00791308

RAYMORT@AUSTINLAW.COM

THE MORT LAW FIRM, PLLC

100 CONGRESS AVE, SUITE 2000

AUSTIN, TEXAS 78701

TEL/FAX: (512) 865-7950

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 1, 2021, a copy of the foregoing was served electronically, via CM/ECF, on all counsel of record who are deemed to have consented to such service under the Court's local rules. Any other counsel of record will be served via facsimile and certified mail, return receipt requested.

By: /s/ Melissa R. Smith